

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

KEVIN CLEMENTE and BARBARA
CLEMENTE

Plaintiffs,
vs.

JANE DOE; TRENDY DIGITAL
CONSULTING, INC.; MAEHAL
ENTERPRISES, INC.; GAUNGDA
LOGISTICS, INC.; AURORRAL TRADE,
INC.; PENGYUAN, INC.; DANCO
GLOBAL, INC.; MIDDLESEX TRUCK
AND AUTO BODY, INC.; WLF TRADING
LIMITED; HUAYI ACCESS CO.
LIMITED; WENYENXING LIMITED and
JOHN DOES 1-10

Defendants.

Civil Action No.: 3:24-cv-00314-
MAS-JBD

**NOTICE OF MOTION FOR
PERMANENT INJUNCTIVE
RELIEF**

To: Middlesex Truck and Auto Body, Inc.
c/o Brian Maloney
65 Gerard Street
Boston, Massachusetts 02119

JPMorgan Chase Bank, N.A.
Mail Code LA4-7100 / 7200
700 Kansas Lane
Monroe, LA 71203

PLEASE TAKE NOTICE that on April 7, 2025 at 10:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, Connell Foley LLP, attorneys for Plaintiffs Kevin Clemente and Barbara Clemente (“Plaintiffs”), will move before the Honorable Michael A. Shipp, U.S.D.J., at the United States District

Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, Trenton, New Jersey, for an Order granting Plaintiff's Motion for Permanent Injunctive Relief compelling JPMorgan Chase Bank, N.A. to turnover to Plaintiffs the \$133,565.00 that was transferred into the account ending in 1740 in the name of Defendant Middlesex Truck and Auto Body, Inc. on or about April 12, 2023; and

PLEASE TAKE FURTHER NOTICE that is support of the Motion, Plaintiffs shall rely upon the Verified Complaint, the Certification of Plaintiff Kevin Clemente, with exhibits, the Affidavit of Brian Maloney, with exhibits, and the Memorandum of Law submitted herewith; and

PLEASE TAKE FURTHER NOTICE that Plaintiffs will request that the proposed form of Order submitted herewith be entered by the Court.

BY: /s/ Aaron H. Gould

Leo J. Hurley, Jr.
Aaron H. Gould
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Harborside 5
185 Hudson Street, Suite 2510
Jersey City, NJ 07311
Attorneys for Plaintiffs Kevin Clemente and Barbara Clemente

Dated: March 10, 2025